

**Illinois Commerce Commission**  
**SBC/Ameritech Illinois Merger, Docket 98-0555**  
**Performance Benchmarks Collaborative, Condition 30**  
**Final Meeting Minutes From 2/14-15/2000**  
**Modified and Approved 3/28/2000**

The third Performance Measures collaborative was held on February 14 and 15, 2000 at the State of Illinois Center in Chicago, Illinois. Below are the minutes from that meeting.

Mr. McClerren, ICC Staff, presided over the meeting.

February 14, 2000

Meeting Purpose

Mr. McClerren emphasized that the meeting should be a collaborative effort and again read the requirements of SBC/Ameritech merger Condition #30. He also reviewed the ground rules for the meeting that were established at the first collaborative.

Administrative Matters

Mr. McClerren proposed that the group review the minutes from the January 18/19, 2000 meeting. It was agreed that the review be postponed until the meeting on February 15 so that meeting participants could complete their review.

Schedule Update/Reports

Mr. Fioretti asked if he could update the team on the Implementation Schedule. Mr. Fioretti he will be posting an updated implementation schedule to the web-site. He indicated that some of the measures would be advanced in the schedule while others will be delayed. The specific list of measures being rescheduled is still under development at this time.

AT&T asked if any measures were being delayed beyond the June 2000 timeframe. Mr. Fioretti stated that no measures were currently being moved out beyond June and that the changes in the end point for the implementation of the measures had not moved out.

AT&T asked if Mr. Fioretti had made any progress on the issue of developing a download capability to be used in reporting the data. Mr. Fioretti indicated that he had spoken with his IT SMEs and they were targeting 3-20-00 to have the capability to download the files. This is still a tentative date. The 2-20-00 reports will be in the FCC format.

AT&T asked Mr. Fioretti if he had done any further investigation into the "mistakes" that AT&T identified with the data on the web-site such as missing z scores. Mr. Fioretti said that his team was looking into the issues but had not specific feedback at this time.

Technically Infeasible

Mr. Fioretti stated that in the course of developing the requirements for the measures, SBC/Ameritech has identified a measure that does not seem to be meaningful to implement. The measure is #93 for partial conversions. Mr. Fioretti stated that in the Ameritech region only one order is issued to convert partial accounts. So for this measure, which compares the due dates from the two orders, Ameritech has only one data point that would cause the results to always be 100%.

This process is different than the one that is used in the Southwestern Bell region to convert partial accounts. In the Southwestern Bell region two orders are issued; one for the restructuring of the account and one for the disconnect of the lines going to the CLEC. There are due dates and thus two data points in the Southwestern Bell process. Therefore the measure provides meaningful data in SWBT.

Mr. Fioretti asked the group if it would be acceptable to consider measure #93 infeasible, given the current Ameritech process. AT&T stated that there is a meeting on Friday, February 18, 2000 to discuss the 13 state process for provisioning partial orders. AT&T requested that the decision to determine the feasibility of measure #93 be delayed until the results of the February 18 meeting are known. Mr. Fioretti stated that he could wait until after the meeting for the CLECs decision on measure #93. However, he requested that the CLECs document their position on measure #93 to him in e-mail as soon as possible.

#### Review of the "Discuss" Measures

Mr. McClerren then asked the group to review those measures classified as "discuss" at the previous collaborative and come to agreement on parity or a benchmark.

- Parity by Design Measures

Measure #71, Common Transport Trunk Blockage - Agreed to benchmark.

Mr. Fioretti stated that there are no common trunk groups that are dedicated to carrying SBC/Ameritech traffic only. Common trunk groups are shared between the CLECs and SBC/Ameritech. Based on this input the group agreed that the standard would remain a benchmark.

Sprint asked if the audit would determine whether this measure was truly parity by design. Mr. McClerren stated that the measure will be audited and whatever is specified in the audit plan is what will be tested.

- Diagnostic Measures

Discussion of the Completion Notice and FOC measure was postponed until the all other measures were discussed.

Measures #34, #51, #64, Canceled Orders - Agreed to parity with retail.

AT&T stated that the Held Order Measures in Michigan, which require a parity comparison, are similar to these Canceled Order measures and therefore asked that parity comparisons be

performed for measures 34, 51 and 64. AT&T also stated that they do not believe that any measure is diagnostic and the parity is required for all measures.

Mr. Fioretti stated that the Michigan measures are different than these measures however, he would agree to parity. He stated that the measures are listed as diagnostic, which means that for the initial implementation there will be no remedy implications.

The CLECs stated their desire to attach penalties to diagnostic measures. Mr. McClerren stated that if the measure was specified as diagnostic in the Texas business rules and had no penalties associated with it then that's how it would initially be implemented in Illinois.

- Measures Under Investigation

Measure #19, Daily Usage Feed Timeliness - Agreed to benchmark.

Mr. Fioretti recapped the issues of moving to a parity comparison on measure #19. He stated that it would require a change to the existing process that aggregates usage and the CLECs would begin receiving 13 files instead of the single usage file they receive today. The CLECs agreed to a benchmark for this measure but reserved the right to discuss the numerical value of the benchmark later.

Measures #107-#109, Collocation Measures - Agreed to parity with SBC/Ameritech affiliate on an interim basis with a review of measure on 6-6-00.

Mr. Fioretti reported that he had collected the historical data on SBC/Ameritech's affiliate for this measure and the affiliate only ordered collocation in three states in 1999; IL was one of them. In those states in which the affiliate ordered collocation there was only data in 7 of 12, 6 of 12 and 2 of 12 months respectively. The affiliate only ordered one type of collocation.

MCI asked if Mr. Fioretti was able to obtain any further information on the deployment plans for project Pronto that might factor into these measures. Mr. Fioretti stated that he would not be sharing detailed information on project Pronto. CLECs had expected that this data might be used to assist in identifying when sufficient volumes would exist that might be used for establishing when this measure should be measured against a benchmark.

Due to the limited availability of affiliate data for this measure at this time the group agreed to implement parity with the SBC/Ameritech affiliate initially and then review the measure results at a meeting on 6-6-00 to determine if the data being provided is meaningful.

- Measures Having No Retail Analog

Measure #16 Percent of Usage Records Transmitted Correctly - Agreed to benchmark.

Mr. Fioretti explained that the difference between the retail and the wholesale billing processes for usage was specifically the creation of the Daily Usage File (DUF). Mr. Fioretti stated that in the retail process usage is just shelved until the end user bill is generated, no daily usage file is generated. In the wholesale process the usage is collected to create the Daily Usage File (DUF) for the CLEC. There is no DUF file on the retail side to compare to.

The CLECs agreed to a benchmark pending review with their billing SMEs.

Measures #105-106, Poles, Conduit, and Right of Way - Agreed to parity with SBC/Ameritech affiliate pending review of the measure 6-6-00.

Mr. Fioretti agreed to a use SBC/Ameritech affiliate data for a parity comparison.

Due to the limited availability of affiliate data for this measure at this time the group agreed to implement parity with the SBC/Ameritech affiliate initially and then review the measure results at a meeting on 6-6-00 to determine if the data being provided is meaningful.

Measures #110-113, Directory Assistance Database - Agreed to parity for electronic updates and a benchmark for manual updates for measures #110 and #111. Agreed to a benchmark for #112 and parity for #113.

Mr. Fioretti stated that there are no manual updates for retail so there is no parity analog for manual CLEC updates. Mr. Fioretti stated that it might be possible to compare CLEC electronic updates to retail updates.

AT&T and Nextlink stated that they would be comfortable with a benchmark for manual updates and a parity comparison for electronic updates. The other CLECs concurred. Based on this input the group agreed to the following; for measures #110 and #111 manual updates will be measured against a benchmark and electronic updates will be measured against parity, for measure #112 a benchmark will be used and for measure #113 a parity comparison will be made.

Measures #114-#115, Coordinated Conversions - Agreed to benchmark pending review of the measure on 6-6-00.

Mr. Fioretti stated that he had done additional research on the possible retail analogs for this measure. He stated that Centrex cutovers generally are done after hours and are not scheduled for a specific time unlike coordinated cutovers for loops and LNP. Centrex cutovers typically do not require a dispatch however, loop and LNP cutovers do require one. Based on these differences Mr. Fioretti suggested that Centrex cutovers are not a reasonable retail analog for CLEC coordinated cutovers.

Mr. Fioretti also stated that "T & F" orders for retail customers are not coordinated so they are not a reasonable analog for CLEC coordinated cutovers.

The CLECs disagreed with Mr. Fioretti's conclusion that there was no retail analog. Mr. McClerren suggested that Mr. Fioretti work with Mr. Kruse of Nextlink to begin a study to look for a retail analog for this measure and collect data on that potential analog. Mr. Fioretti and Mr. Kruse agreed to collaborate on the study and to provide readout of their findings to the group at the 6-6-00 meeting. The CLECs agreed to accept a benchmark for this measure until the results of the study are known.

AT&T stated that they are not able to schedule actual times for coordinated cutovers. Mr. Fioretti stated that he was unaware of this problem but he would investigate it and provide feedback at the meeting tomorrow, 2-15-00.

CoreComm requested that Mr. Fioretti provide information regarding the process for residence and business cutovers. MCI requested further information on the definition of projects. Mr. Fioretti stated that he would research the information and bring it back to the group. Mr. Fioretti also stated that there are no exclusions for projects in these measures.

Measures #120-#121, Bona-Fide Requests - Discuss further at tomorrow's meeting.

Mr. Fioretti asked if it was possible to discuss the measures by separating the "traditional" BFR process from that which is the focus of CLEC issues today. The CLECs expressed concerns with the current no-facilities, special construction process that suggests that they issue BFRs. They stated that these measures do not address their concerns nor do they provide sufficient data to access whether or not the SBC/Ameritech affiliate is being asked to use the BFR process in the same manner as the rest of the CLECs.

Mr. Fioretti offered to provide a parity comparison to the SBC/Ameritech affiliate. Mr. McClerren stated that it was acceptable to use the SBC/Ameritech affiliate for a parity comparison. The CLECs requested that these measures be discussed again at tomorrow's meeting.

Measures #7, #7.1 and #8, Completion Notifications - Discuss further at tomorrow's meeting.

Mr. Fioretti reviewed the diagram provided in the minutes from the last meeting, which documented the completion process. Mr. Fioretti stated that SBC/Ameritech aggregates field completions when multiple service orders are needed to complete a single CLEC purchase order. The 865 completion notices are not sent to the CLEC until the final service order related to the purchase order completes. The need for multiple service orders is driven by limitations in Ameritech's legacy retail ordering systems which are used for CLEC and retail orders. The same limitations apply to wholesale and retail orders.

At this point Mr. McClerren adjourned the meeting until 9:00 AM tomorrow, 2-15-00.

### **February 15, 2000**

Mr. McClerren asked to review the contents of the SBC/Ameritech filing due 3-6-00. Mr. Fioretti stated that the filing would contain the implementation schedule, the technically infeasible measures and the measures, if any, that will not have a parity standard.

Mr. McClerren stated that the collaborative participants should be given the opportunity to review the filing to insure that it accurately reflected the proceedings of the collaboratives. Mr. Fioretti agreed to provide the group with an electronic draft of the filing by 9:00 AM on 3-1-00. Mr. McClerren stated that the CLECs must have their comments back to Mr. Fioretti no later than 9:00 AM on 3-3-00.

MCI asked when the business rules would be reviewed. Mr. Fioretti stated that the business rules would be reviewed at subsequent meetings of the collaborative.

### **Review of Minutes**

Mr. McClerren led a review of the minutes of the 1-18/19-00 collaborative. He asked that the measure numbers for the technically infeasible measures be added to the minutes and the dates for

this meeting be corrected. Mr. Fioretti agreed to provide the updates to Mr. McClerren for posting on the web-site. No other changes were requested.

### Discussion of Measures

Measures #7, #7.1 and #8 Completion Notifications - Proposed benchmark of 99% for measures #7 and #7.1.

Mr. Fioretti reviewed the completion diagram presented yesterday. AT&T stated that after further review they still believe retail analogs exist for these measures but they are willing to accept a benchmark if the one day interval is changed to 30 minutes and the benchmark changes from 97% to 99%.

Mr. Fioretti stated that he could not accept such a change because it takes approximately one hour to compile the transactions for measure #7.1. Mr. Fioretti also stated that absent any data to know how SBC/Ameritech is performing on this measure he could not commit to the change.

The CLECs indicated that there are problems with the current process. There are times when part of a purchase order is completed but the CLEC has no knowledge of the completion because SBC/Ameritech is waiting until all the orders associated with the purchase order are completed before sending the 865. Mr. Fioretti stated that providing multiple completion notifications for a single purchase order number (PON) would require modifying the way that the standard EDI interface works. This should be handled through discussion at national forums since they are who determines the EDI standards. A change to deliver line item completions is beyond the scope of this collaborative.

AT&T stated that they were willing to accept the measures as they are, with the one hour and one day timeframes provided the benchmark was changed to 99%. They also requested that the measure be reviewed at the 6-6-00 meeting. The other CLECs supported this position.

Measures-#5 and #6, Firm Order Confirmations - Discuss further on 2-28-00 conference call.

Mr. Fioretti reviewed the diagram depicting the FOC process that was included in the 1-18/19-00 collaborative minutes. He re-iterated that there is no retail analog to a FOC.

AT&T re-stated that they believe the FOC measures should be parity measures. Mr. Fioretti stated that retail reps do not receive a FOC and in those instances where CLECs are given direct access to the legacy retail ordering systems, no FOC measure is provided. The Illinois Commerce Commission provided a mechanism for the funding and development of a direct interface in the merger agreement, if CLECs wanted to establish direct access.

AT&T stated that they were never given the option to access Ameritech's legacy ordering systems. Mr. McClerren stated that part of condition 29 of the merger stipulation allows a CLEC to request access to SBC/Ameritech's legacy ordering systems provided they are willing to fund 50% of the development costs.

AT&T asked what the current FOC performance is now. Mr. Fioretti stated that SBC/Ameritech's previous standard was 24 hours however, work is now being done to re-engineer the processes to meet the 5-hour standard.

AT&T asked if Mr. Fioretti had done any research on the differences of opinion as to what was being checked before a FOC was sent. Mr. Fioretti stated that he had identified at least 91 different items that are checked on a resale order prior to a FOC being sent.

AT&T raised concerns regarding unsolicited FOCs and their impact on performance measures. They stated that unsolicited FOCs are being sent for retail rep errors. AT&T stated that all performance measures should be calculated using the FOC sent to them as a result of their purchase order and that they need to be sure that the FOCs for DSL are real.

Mr. Fioretti stated that he would check on the problem of unsolicited FOCs for retail rep error and on the FOCs for DSL. He stated that he was unaware of the problem of unsolicited FOCs for rep error however, he was working to properly account for unsolicited FOCs associated with due date changes.

Measures #7, #7.1 and 8, Completion Notification - Agreed to benchmark of 99% for measures #7 and #7.1. Measure #8 to remain diagnostic, measure to be reviewed at 6-6-00 meeting.

Mr. McClerren asked what the group had agreed to for these measures. Mr. Fioretti offered to split the difference and change the benchmark to 98% instead of 99% as AT&T proposed. AT&T stated that since 99% is only an interim benchmark SBC/Ameritech should just implement it since it is not significantly different than SBC/Ameritech's proposed 98%. AT&T would accept nothing less as a benchmark.

Mr. Fioretti stated that he could agree to the 99% benchmark as long as it would be reviewed at the 6-6-00 meeting and the business rules and the definitions for measures #7 and #7.1 did not change. Mr. Fioretti also stated that measure #8 would remain a diagnostic measure until the data could be reviewed on 6-6-00.

MCI agreed with Mr. Fioretti's proposal. AT&T stated that a benchmark or parity comparison should be implemented for each measure but that in the interest of moving forward they would agree to Mr. Fioretti's proposal.

-Measures #5, #6, and #94, Firm Order Confirmations - Discuss further on 2-28-00 conference call.

Sprint stated that SBC/Ameritech needs to be consistent in its treatment of the FOC in all measures. Ideally the FOC resulting from the CLEC's purchase order should be used in all the measurement calculations. The unsolicited FOC should be accounted for in the measures.

Mr. Fioretti stated that he would have to do further investigation to understand exactly how the unsolicited FOCs are affecting the performance measures. AT&T stated that SBC does not send unsolicited FOCs. SBC sends jeopardies instead of unsolicited FOCs.

Mr. Fioretti stated that he would check on the status of implementing jeopardy notices instead of unsolicited FOCs .

CoreComm asked Mr. Fioretti to make sure that orders rejected in error are being measured against the original receive time as well.

Sprint and AT&T emphasized that the performance measures need to be calculated using the FOC generated as a result of the CLEC's purchase not the unsolicited FOC. Sprint stated that if SBC/Ameritech based the performance measures on the unsolicited FOC then Sprint would contend that the performance measures were not implemented as in Texas and SBC/Ameritech did not meet its merger requirements in Illinois.

Mr. Fioretti stated that he would be looking at methods to eliminate unsolicited FOCs that change due dates. Sprint stated that if this were done then a benchmark would be acceptable.

AT&T stated that they still believed that parity was required and cited previous orders in Louisiana and North Carolina that suggested that FOCs had a retail analog.

Mr. Fioretti stated that those orders were old and a more relevant comparison would be Bell Atlantic's 271 filing, which the FCC approved, that calls for a benchmark on the FOC measures.

AT&T stated that California is offering tighter benchmarks than SBC/Ameritech. Mr. Fioretti stated that the California benchmark is 20 minutes for orders that totally flow through the system and 6 hours for other orders. SBC/Ameritech has a 5-hour FOC benchmark that is actually more stringent than the California requirement, as it represents a blended rate for both flow through and non-flow through orders.

AT&T and MCI stated that parity is required for the FOC measures. Mr. McClerren suggested that the group continue to think of creative solutions to this issue and discuss it further on a conference call prior to 3-1-00. The group agreed to discuss FOCs and the issue of technical feasibility of measure #93 on a conference call on 2-28-00, starting at 2:30 PM. AT&T offered to reserve the conference bridge and send the notification out to the group.

-Measures 121 and 122, Bona-Fide Requests - Agreed to parity with SBC/Ameritech affiliate contingent upon acknowledgement of current BFR process deficiencies.

The CLECs agreed to parity with the SBC/Ameritech affiliate for this measure provided that SBC/Ameritech acknowledge in its filing to the Commission that the measures as proposed do not reflect the current use of the BFR process for 2 wire loops. Mr. Fioretti agreed to this proposal.

## **Conclusion**

Mr. McClerren reviewed the timeline for the SBC/Ameritech filing. An electronic copy is due to the group from Mr. Fioretti by 3-1-00 at 9:00 AM. Comments are due back to Mr. Fioretti no later than 9:00 AM on 3-3-00. SBC/Ameritech will file the document with the Commission on 3-6-00.

On 2-28-00, a conference call will be held to discuss measure #93 for account restructures and measures #5, #6, and #94 for FOCs. Mr. McClerren stated that the only potential issues for the 300-day evaluation are the FOC measures.

The group agreed to hold the next meeting on 3-28/29-00. The meeting will begin at 1:00 PM on 3-28-00 and conclude no later than 3:00 PM on 3-29-00. Mr. McClerren will provide an agenda to the group with the meeting specifics at a later date.



Mr. McClerren asked that the group send him any issues for the next meeting so that they can be added to the agenda.